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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

February 27, 1998

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REGION 12

Mr. John Hilliard, President
Southwest Shipyard, L.P.
18310 Market Street
Channelview, Texas 77530

- Re: a) Southwest Shipyard, L.P., EPA ID No. TXD000820274, Solid Waste No. 31208
- b) Agreed Order Docket No. 97-0453-IHW-E, provision 2i
- c) Workplan for Site Assessment of portions of A, B, and C Yards, prepared by Groundwater Services, Inc. on behalf of Southwest Shipyard, L. P., submitted to TNRCC, October 27, 1997
- d) Southwest Shipyard, L. P. Response Letter (dated February 11, 1998) to the TNRCC letter dated January 28, 1998 - Approval with Modifications

Dear Mr. Hilliard:

The staffs of the Pollution Cleanup Division (PCD) and of the Houston Regional Office (Region) of the Texas Natural Resource Conservation Commission (TNRCC) have completed a review of the above referenced items c and d. Our evaluation indicates that they can be approved with the following modifications. Our comments are in referenced to Table 1 in Southwest Shipyard, L. P. (Southwest) response.

- Roll-off Bin Storage Area (A Yard), TNRCC comment 4: Please submit all analytical data and a boring log from soil boring SB-1 with the final report required below.
- Barge Painting Area (C Yard), TNRCC comment 1, Southwest response item 3: The TNRCC requests that Southwest collect two sets of sediment samples from the Old San Jacinto River. Each set should be composed of three discrete samples: the first sample adjacent to the shoreline, the second sample at 27 feet from the shore, and the third sample

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at 54 feet from the shore. The first set of the samples should be located directly adjacent to the proposed soil sample no. SS-BP-3 and the second set of the samples should be located directly adjacent to the proposed soil sample no. SS-BP-9. Additionally, we suggest one discrete river sediment sample at the north end tip of the C Yard (SS-BP-10 location). Please compare the described locations with Figure 1 in Southwest response. All river sediment samples should be collected at a depth of approximately 6 inches from the surface of the river bottom.

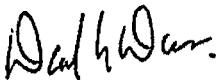
- Sheet Metal Dock Area (B Yard). TNRCC comment 7: The TNRCC requests two additional soil borings within this area. The suggested locations are 75 feet and 125 feet due south (using true north) of proposed boring SS-SM-9. However, during the field activities, the regional investigator may modify the locations if deemed necessary.

Southwest shall begin the investigation including the requested modifications at the A, B, and C Yards, within 2 weeks of the date of receipt of this letter, subject to the consent of the property owners. Southwest has notified the TNRCC staff that the B Yard property owner granted permission for Southwest to investigate the B Yard. However, it is our understanding that Southwest is still in the process of negotiating with the C Yard property owner.

The TNRCC requests that Southwest submit a final report, including a revised supplemental plan and a schedule of completion if necessary, within 90 days following the approval of the workplan (reference c) and the revised plan (reference d).

The TNRCC appreciates your continued cooperation in this matter. If you have any questions regarding this matter, please contact Ms. Sue Rogers of the Pollution Cleanup Division at 512/239-6213. Questions regarding the Agreed Order can be directed to Mr. John Sadlier of the Enforcement Division at 512/239-6012.

Sincerely,



David L. Davis, Director
Pollution Cleanup Division

DLD/SR

cc: Ms. Elaine A. Higgins, Groundwater Services, Inc. 2211 Norfolk, suite 1000, Houston, Texas, 77098-4044
Ms. Marsha Hill, Waste Program Manager, TNRCC Houston Regional Office (Region 12)
Mr. John Sadlier, Waste Section, Enforcement Division (MC-219)